



MWH

Transmittal

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To: Mark Vishnepske, KDHE
Brad Roberts, EPA (2 copies)
CC: Brenda Epperson, MRP
Kent Biggerstaff, MRP
Date: December 3, 2013
File: 10502544
Sender: Jay Mednick

This data is submitted:

- ☐ For Your Information
☒ For Your Records
☐ For Your Review
☐ As Requested

☐ Requested ☒ Enclosed ☐ Sent Separately via _____
☐ Report(s) ☐ Specifications ☐ Cost Estimate(s) ☐ Shop Drawings
☐ Test Results ☐ Prints ☐ Test Sample(s) ☐ Other

Reference: MRP Properties Company, LLC – Arkansas City; IMOM Plan

Please find enclosed the following items:

1. IMOM Plan revised pages 1-3 and 1-4 – printed copies.
2. CD containing PDF files containing revised IMOM Plan (11/25/13) with corrected pages 1-3 and 1-4; Response to IMOM Plan Comments 11/25/13; Redlined Page 1-3; and Revised Cover Page

Please discard the CD and replacement pages 1-3 and 1-4 provided on 11/25/13 and replace with the enclosed copy.

Jay

MWH

RCRA



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AWMD/WRAP-KNRP

MRP Properties Company, LLC

Post Office Box 696000 • San Antonio, Texas 78269-6000 • Telephone (210) 345-2000

Brenda B. Epperson
Manager

Environmental Liability & Remediation Management

November 25, 2013

Chief of the Hazardous Waste Permits Section
Kansas Department of Health and Environment
Bureau of Waste Management
ATTN: Mostafa Kamal, P.E., CHMM
1000 SW Jackson, Suite 320
Topeka, Kansas 66612-1366

U.S. Environmental Protection Agency, Region 7
Air and Waste Management Division
RCRA Corrective Action & Permits Branch
ATTN: Brad Roberts, P.G.
11201 Renner Boulevard
Lenexa, Kansas 66219

Re: **Response to KDHE and EPA Comments of November 5, 2013**
Part II Permit Interim Measures Operation and Maintenance Plan
MRP Properties Company, LLC – Arkansas City, Kansas
EPA ID No. KSD087418695
VIA FEDERAL EXPRESS TRK#’s: 7972 3818 0906 / 7972 3820 2959

Dear Mr. Kamal and Mr. Roberts:

MRP Properties Company, LLC (MRP) has reviewed the Kansas Department of Health and Environment (KDHE) letter dated November 5, 2013 containing one comment based on their additional review of the Interim Measures Operation and Maintenance (IMOM) Plan 1 submitted on October 16, 2013 in response to the KDHE and EPA comments dated September 23, 2013. The letter indicates the EPA has not reviewed the associated cost estimate to implement the IMOM Plan.

MRP’s response to the KDHE and USEPA comments are provided in this letter. This letter also transmits the revised IMOM Plan pages and redlined text. A copy of this letter and the revised IMOM Plan are included in an Adobe PDF file on the enclosed CD for each agency.

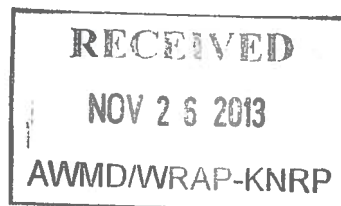
The following presents KDHE’s November 5, 2013 comment (in italics) followed by MRP’s response.

Comment 1

The third paragraph of Section 1.4 on Page 1-3 states that the purpose of the interim measure recovery wells is to recover product. This statement contradicts the preceding paragraph. Please revise the third paragraph of Section 1.4 on Page 1-3 to state that the purpose of the interim measure recovery wells is to reduce LNAPL, control groundwater migration, and provide containment of both dissolved phase constituents in groundwater and LNAPL.

MRP Response

The last sentence of the second paragraph of Section 1.4 on Page 1-3 contains the same statement as in KDHE’s comment. Including the statement in the third paragraph of Section 1.4 on Page 1-3 would be redundant. We propose revising the text as follows: move the last sentence of the third paragraph of Section 1.4 on Page 1-3 to the end of the preceding sentence and delete the remainder of the third paragraph of Section 1.4. A revised page and a redlined page showing the proposed revisions are attached for KDHE and EPA review.



Response to November 5, 2013 IMOM Plan Comment
November 25, 2013
Page 2

If you have any questions or comments regarding this response to the IMOM Plan comment, please contact me at 210/345-4619 or Jay Mednick, MWH at 303/291-2262.

Sincerely,



Brenda B. Epperson

Enclosures: Revised IMOM Plan, redlined page, and CD

cc: Mark Vishnefske, KDHE BWM (w/o encl)
Kent Biggerstaff – MRP Properties Company, LLC (w/encl)
Jay Mednick – MWH (w/encl)